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Attorneys for Defendants  
Robert Gomez, Gomez & Associates, Inc.  
and Rock'n Rob Enterprises

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PCPLV LLC d/b/a Pinnacle.  
Compounding Pharmacy, Ofir Ventura,  
Cecilia Ventura, Brandon Jimenez, Robert  
Gomez, Gomez & Associates, Inc., Rock'n  
Rob Enterprises, Amir Shalev, D.P.M., AS  
Enterprises, Inc., and Ivan Lee Goldsmith,  
M.D.  
Defendants.

Case no.: 2:21-cv-00184

**STIPULATION AND ~~PROPOSED~~**  
**ORDER TO EXTEND TIME TO**  
**RESPOND TO COMPLAINT**

(Third Request)

**STIPULATION AND ~~PROPOSED~~ ORDER TO**  
**EXTEND TIME TO RESPOND TO COMPLAINT**

Plaintiff, the United States of America, and Defendants Robert Gomez, Gomez & Associates, Inc., and Rock'n Rob Enterprises ("Defendants") stipulate to extend the time by which Defendants may respond to the Complaint in this action by 30 days from March 12, 2024 to April 11, 2024, and in support thereof, say:

1. Plaintiff filed their Complaint in this action on February 2, 2021.

2. Defendant, Robert Gomez was served with the Complaint in this on or about January 23, 2024.

3. There is good cause to extend the time by which Defendants may respond to the Complaint in this action because counsel for Defendants and Plaintiff are working towards and hoping for a resolution.

1           4.       Based upon Defendants' request, the Parties have agreed to extend the deadline by  
2 which Defendants may respond to the Complaint by 30 days from March 12, 2024 to April 11,  
3 2024, subject to the Court's approval.

4           5.       Defendants have not previously requested an extension of the deadline to respond  
5 to the Complaint.

6           **IT IS SO STIPULATED**

7           Dated this 11th day of March, 2024. Dated this 11th day of March, 2024.

8           Jason M. Frierson  
9 United States Attorney

David T. Brown  
Brown, Brown & Premsrut

10          /s/ Christian Ruiz

/s/ David T. Brown

11          \_\_\_\_\_  
12 CHRISTIAN RUIZ  
13 Assistant U.S. Attorney  
14 Counsel for United States of America

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DAVID T. BROWN  
Counsel for Defendants

15                               IT IS SO ORDERED

16                                 
17                               \_\_\_\_\_  
18 DANIEL J. ALBREGTS  
19 UNITED STATES MAGISTRATE JUDGE

20                               DATED: March 12, 2024  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 11, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/EMF. I also certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/EMF.

/s/ Alexis Budner

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ALEXIS BUDNER